



ZANTAT HOLDINGS BERHAD

(Registration No. 202101040483 (1440783-X))

CODE OF CONDUCT & ETHICS

Version 1	Adopted on 19 February 2024
Version 2	Adopted on 21 February 2025



CODE OF CONDUCT & ETHICS

Zantat Holdings Berhad (“ZHB” or the “Company”) and its subsidiaries and associate company (collectively known as “Zantat Group” or the “Group”) and its employees must, at all times, comply with all applicable laws and regulations. The Group will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The Group does not permit any activity that fails to stand the closest possible public scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing Zantat Group’s operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek appropriate legal advice.

This Code of Conduct & Ethics is developed in alignment with the principles and practices outlined in the Malaysian Code on Corporate Governance (MCCG). ZHB is committed to upholding the highest standards of ethical behavior, accountability, and governance as recommended by the MCCG.

Compliance with the Law

This Code of Conduct & Ethics must be read in conjunction with ZHB’s Anti-Bribery & Corruption (“ABC”) Policy, which outlines measures to prevent and address bribery and corruption in all business dealings. Directors and employees are required to comply with all applicable laws and regulations wherever ZHB does business, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act 2018, Personal Data Protection Act 2010, and Competition Act 2010. Perceived pressures from supervisors or demands due to business conditions are not excuses for violating the law. Should there be any questions or concerns about the legality of an action, employees are responsible for checking with the appropriate level of management. ZHB reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

General Employee Conduct

Zantat Group expects its employees to conduct themselves in a businesslike manner.

Any type of harassment and violence will not be tolerated. These actions or behaviors include derogatory comments based on gender, racial or ethnic characteristics, unwelcomed sexual advances, spreading of malicious rumors, use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material. All employees and managers are required to comply with all anti-harassment laws in the locations where they work. Subject to applicable laws and regulations, the Group prohibits the possession and/or use of firearms, other weapons, explosive devices and/or other dangerous materials on the Group premises or while conducting Group business.

Conflicts of Interest

Zantat Group expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group. A conflict of interest arises when you have a personal interest that can be seen to have the potential to interfere with your objectivity in performing duties or exercising judgement on behalf of the Group. Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if an employee senses that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should



immediately communicate all the facts to their supervisor. Failure to declare any conflict of interest may result in disciplinary action against you.

All employees and directors are required to submit an annual declaration (if applicable) of any actual, potential, or perceived conflicts of interest to the Human Resources or Compliance Department. Failure to disclose conflicts may result in disciplinary action, including termination of employment.

Outside Activities, Employment, and Directorships

As a full-time employee, you must not take up employment outside the Group or engage in any outside business or service which may be in competition with the Group or give rise to actual or potential conflict of interest.

All employees take serious responsibility towards Zantat Group's good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to Zantat Group and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside Zantat Group that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving Zantat Group of their best efforts on the job.
- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in the Company's best interest.

Relationships with Clients and Suppliers

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organisation that has a contractual relationship with Zantat Group, or that provides goods or services, or both, to Zantat Group if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of Zantat Group.

Gifts, Entertainment, and Favors

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organisation with whom or with which Zantat Group has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with Zantat Group might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

Kickbacks and Secret Commissions

Regarding the Zantat Group's business activities, employees may not receive payment or compensation of any kind, except as authorized under the organisation's business and payroll policies. In particular, Zantat Group strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

Organisation Funds and Other Assets

Employees who have access to Zantat Group funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Group's policies and procedures or other explanatory materials, or both. Zantat Group imposes strict standards to prevent fraud and



dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or seek appropriate legal guidance so that Zantat Group can promptly investigate further.

When an employee's position requires the expenditure on organisation funds or incurring any reimbursable personal expenses, that individual must use good judgment on the Group's behalf to ensure that good value is received for every expenditure.

Organisation funds and all other assets of Zantat Group are purposed for Zantat Group only and not for personal benefit. This includes the personal use of organisational assets, such as computers.

Organisation Records and Communications

Accurate and reliable records of many kinds are necessary to meet the Zantat Group's legal and financial obligations and to manage the affairs of the Group. The Group's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

Dealing with Outside People and Organisations

Employees must take care to separate their personal roles from Zantat Group positions when communicating on matters not involving Zantat Group business.

Employees must not use Zantat Group identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve Zantat Group business, employees must not presume to speak for Zantat Group on any topic, unless they are certain that the views they express are those of the organisation, and it is the organisation's desire that such views be publicly disseminated.

When dealing with anyone outside Zantat Group, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the Group, or any outside individual, business, or government body.

Prompt Communications

In all matters relating to customers, suppliers, government authorities, the public and others in the Group, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

Privacy and Confidentiality

When handling financial and personal information about customers or others with whom Zantat Group has dealings, observe the following principles:



- Collect, use, and retain only the personal information necessary for the Zantat Group's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

ZHB complies with the Personal Data Protection Act (PDPA) 2010 to ensure the confidentiality and security of personal data. Employees must handle all personal and sensitive data in accordance with the PDPA. Breaches of this Act will result in disciplinary action and may lead to legal penalties.

Whistleblowing Mechanism

ZHB is committed to fostering an open and transparent culture. Employees, business associates, and other stakeholders are encouraged to report any suspected unethical or unlawful behavior through the company's whistleblowing channels. Reports can be made confidentially via [email/phone] or as described in the company's Whistleblowing Policy. The company ensures confidentiality and protection against retaliation for individuals who raise concerns in good faith.

This Code of Conduct & Ethics was approved by the Board of Directors on 21 February 2025.